

ELVIS CHAN 11/29/2022

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF LOUISIANA  
3 MONROE DIVISION

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7 STATE OF MISSOURI, et al., )  
8 Plaintiff, )  
9 vs. ) Case No.  
10 JOSEPH R. BIDEN, JUNIOR, et ) 3:22-cv-01213  
11 al., ) -TAD-KDM  
12 Defendants. )  
13 )  
14 )  
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16 TUESDAY, NOVEMBER 29, 2022

17 ZOOM VIDEOTAPED DEPOSITION OF ELVIS CHAN

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24 REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

25

**EXHIBIT**  
**14**

ELVIS CHAN 11/29/2022

Page 212

1           A.     So as I mentioned to you before, the only  
2     individuals I remember who regularly spoke at these  
3     meetings were Mr. Masterson and Mr. Scully.

4           Q.     And those individuals discussed how to  
5     defend against hacking operations?

6           A.     Yes.

7           Q.     Did they specifically say that they  
8     anticipated or there was a risk that there might be  
9     Russian hack-and-leak operations before the 2020  
10    election?

11          A.     I don't specifically recall, but that  
12     sounds like something that they would have the  
13     general -- they would have the same concern or  
14     similar concern that I have.

15          Q.     They might -- you believe they expressed  
16     that concern in these meetings?

17          A.     I do not recall any specific situations  
18     where they did, but that, I believe, is something  
19     that they may have discussed.

20          Q.     And that would include both Mr. Masterson  
21     and Mr. Scully, to your recollection?

22          A.     Yes.

23          Q.     Were you aware in 2020 that the FBI had  
24     Hunter Biden's laptop in its possession?

25          MR. SUR: Objection; lacks foundation,

ELVIS CHAN 11/29/2022

Page 221

1 let me ask you this: Did you express that concern  
2 would be, quote, likely in October?

3 A. I would say possible in October.

4 Q. He refers to the federal law enforcement  
5 agencies, plural, in that sentence. Do you see  
6 that?

7 A. Yes.

8 Q. And other federal law enforcement agencies  
9 other than the FBI also convey an expectation or  
10 concern that Russian hack-and-leak operations would  
11 occur shortly before the 2020 election?

12 A. Not to my -- not to my knowledge.

13 Q. So the only agency you recall conveying  
14 that information is the FBI?

15 A. The only federal law enforcement agency I  
16 remember conveying our concern was the FBI.

17 Q. How about any other agency?

18 A. As I mentioned, I believe CISA would have  
19 had the same concern as the FBI.

20 Q. And that was relayed through Mr. Masterson  
21 and Mr. Scully, I think you said, correct?

22 A. Correct.

23 Q. Any other agencies or federal officials  
24 raise those concerns other than you, Ms. Dehmlow,  
25 Mr. Masterson and Mr. Scully?

ELVIS CHAN 11/29/2022

Page 222

1           A.    I believe that the senior election  
2    official from ODNI would also have flagged that as  
3    a concern. Because that was a concern across the  
4    entire U.S. government.

5           **Q. Who is that?**

6           A.    At the time the senior election official  
7    was Shelby Pierson.

8           **Q. What did Mr. -- is that Mr. or Ms.?**

9           A.    Ms., Ms. Pierson.

10          **Q. What did Ms. Pierson say about that  
11 concern for the social media platforms in these  
12 meetings?**

13          A.    I don't recall what she exactly said, but  
14    the sentiment would have been similar to what I  
15    already conveyed, which is that I was concerned  
16    about the potential for hack-and-leak operations.  
17    However, we were not aware of any pending  
18    hack-and-leak operations. I believe she would have  
19    shared the same sentiment.

20          **Q. Do you remember anything specific about  
21 what she said?**

22          A.    I don't.

23          **Q. Mr. Roth in the affidavit goes on to say,  
24 "I was told in these meetings that the intelligence  
25 community expected that individuals associated with**